

Exhibit B

From: Ari Rafilson <arafilson@shorechan.com>
Sent: Monday, March 28, 2022 1:58 PM
To: Esha Bandyopadhyay; Warren Mabey, Jr.
Cc: stamoulis@swdelaw.com
Subject: RE: SRC v Xilinx - motion to quash subpoena

Warren and Esha,

Thank you for conferring yesterday regarding Xilinx's anticipated motion for a protective order. After consideration we do not have a proposal for you which we believe would meet or come close to meeting Xilinx's stated requirements regarding new and existing subpoenas, namely that FG SRC (1) stop serving subpoenas and (2) withdraw the majority of its existing subpoenas.

As a related matter, regarding the meet and confer itself, as I and/or Stam pointed out during the confer, you (Esha) made two false accusations. First you stated that I told you that FG SRC performed no investigation when issuing these subpoenas. That is incorrect. Instead, I told you that (1) the subpoenas were sent out in an accelerated manner given current deadlines, (2) our investigation is work product, and (3) you had mischaracterized my statements. While it is ordinarily not my practice to interrupt people, I corrected you as soon as you made this misstatement. Second, you stated that Xilinx had been trying to confer with FG SRC for a week. That is also incorrect. As Stam pointed out Warren emailed Stam around COB on Wednesday. Stam was in trial and involved in related preparations, and that trial continues. Despite the ongoing trial, he and I made time to speak with you and Warren on Sunday.

Best Regards,

Ari

From: Warren Mabey, Jr. <mabey@fr.com>
Sent: Sunday, March 27, 2022 10:06 AM
To: Ari Rafilson <arafilson@shorechan.com>
Cc: Stamatios Stamoulis <stamoulis@swdelaw.com>; Esha Bandyopadhyay <esha@fr.com>
Subject: RE: SRC v Xilinx - motion to quash subpoena

CAUTION: External Email!

Stam – you able to hop on?

From: Warren Mabey, Jr.
Sent: Saturday, March 26, 2022 3:21 PM
To: 'Ari Rafilson' <arafilson@shorechan.com>
Cc: stamoulis@swdelaw.com; Esha Bandyopadhyay <esha@fr.com>
Subject: RE: SRC v Xilinx - motion to quash subpoena

Invite sent. Talk to y'all at 11amET tomorrow.

From: Ari Rafilson <arafilson@shorechan.com>
Sent: Saturday, March 26, 2022 3:12 PM
To: Warren Mabey, Jr. <mabey@fr.com>

Cc: stamoulis@swdelaw.com; Esha Bandyopadhyay <esha@fr.com>

Subject: Re: SRC v Xilinx - motion to quash subpoena

Warren, Can you talk at 11 am ET tomorrow? If so please send Stam and I a dial in or let me know if you prefer that I provide one.

Ari

On Mar 26, 2022, at 12:53 PM, Warren Mabey, Jr. <mabey@fr.com> wrote:

CAUTION: External Email!

Stam, and Ari cc'd. This is straightforward. Because you were in trial I did not force a meet and confer on Thursday or Friday. We are available today and tomorrow to accommodate you. Let us know when you are available. You continue to have time to serve more subpoenas since I emailed on Wednesday despite being in trial; you have time for a brief call to confirm that you will oppose our motion to quash. We plan to file the motion on Monday. If you don't want to get on the phone, we will note that we gave you days to respond and options to meet and confer.

From: Stamatios Stamoulis <stamoulis@swdelaw.com>

Sent: Friday, March 25, 2022 5:06 PM

To: Warren Mabey, Jr. <mabey@fr.com>

Cc: Esha Bandyopadhyay <esha@fr.com>

Subject: RE: SRC v Xilinx - motion to quash subpoena

I can do a quick call at 9AM on Tuesday. We are starting at 10AM on that day

You can talk to Ari about what additional subpoenas may be served before then.

From: Warren Mabey, Jr. <mabey@fr.com>

Sent: Thursday, March 24, 2022 8:30 PM

To: Stamatios Stamoulis <stamoulis@swdelaw.com>

Cc: Esha Bandyopadhyay <esha@fr.com>

Subject: RE: SRC v Xilinx - motion to quash subpoena

Stam, we can meet and confer on Wednesday if you agree to stop the deluge of subpoenas before we meet and confer. Otherwise, we should plan to talk over the weekend, so as to not interfere with your trial schedule. Whichever option you choose, please propose times and I'll send a dial in.

From: Stamatios Stamoulis <stamoulis@swdelaw.com>

Sent: Thursday, March 24, 2022 5:29 PM

To: Warren Mabey, Jr. <mabey@fr.com>

Cc: Esha Bandyopadhyay <esha@fr.com>

Subject: RE: SRC v Xilinx - motion to quash subpoena

My co-counsel thinks a further meet and confer could help narrow the issues

Can we set something for Wednesday? My trial should be done by then

From: Warren Mabey, Jr. <mabey@fr.com>
Sent: Thursday, March 24, 2022 5:21 PM
To: Stamatios Stamoulis <stamoulis@swdelaw.com>
Cc: Esha Bandyopadhyay <esha@fr.com>
Subject: RE: SRC v Xilinx - motion to quash subpoena

Hi Stam. So does SRC oppose?

From: Stamatios Stamoulis <stamoulis@swdelaw.com>
Sent: Wednesday, March 23, 2022 4:48 PM
To: Warren Mabey, Jr. <mabey@fr.com>
Cc: Esha Bandyopadhyay <esha@fr.com>
Subject: RE: SRC v Xilinx - motion to quash subpoena

[This email originated outside of F&R.]

In trial

Will reach out to client and get back to you

From: Warren Mabey, Jr. <mabey@fr.com>
Sent: Wednesday, March 23, 2022 4:46 PM
To: Stamatios Stamoulis <stamoulis@swdelaw.com>
Cc: Esha Bandyopadhyay <esha@fr.com>
Subject: SRC v Xilinx - motion to quash subpoena

Stam,

I just tried to reach you on the phone and left a voicemail. We are planning to move for a protective order in connection with the 50+ third party subpoenas that SRC just served. Can you please confirm that SRC opposes the motion.

Thanks,

Warren

Warren K Mabey, Jr. :: Principal :: Fish & Richardson P.C.
222 Delaware Avenue 17th Floor, P.O. Box 1114, Wilmington, DE 19899
302 778 8456 direct :: 302 652 5070 main :: 302 652 0607 fax

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